

during the course of the trial. A copy of these proposed instructions will be delivered to the Court on a 3 ½" floppy disk in the WordPerfect 9 format.

Depending on the evidence adduced at trial, some of the instructions included herein may not be appropriate, and some additional instructions may be required. The government respectfully reserve the right to request additional jury instructions or modifications of the attached instructions at trial.

DATED: February 18, 2009

Respectfully submitted,

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/s/
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TABLE OF JURY INSTRUCTIONS

**NINTH CIRCUIT
MODEL JURY**

<u>NO.</u>	<u>INSTRUCTIONS</u>	<u>DESCRIPTION</u>
1	1.12	OUTLINE OF TRIAL
2	2.2	BENCH CONFERENCES AND RECESSES
3	2.3	STIPULATED TESTIMONY
4	2.4	STIPULATIONS OF FACT
5	2.5	JUDICIAL NOTICE
6	2.7	TRANSCRIPT OF RECORDING IN ENGLISH
7	3.12	SEPARATE CONSIDERATION OF MULTIPLE
8		COUNTS
9	4.1	STATEMENTS BY DEFENDANT
10	4.9	TESTIMONY OF WITNESSES INVOLVING
11		SPECIAL CIRCUMSTANCES – IMMUNITY,
12		BENEFITS, ACCOMPLICE, PLEA
13	4.17	OPINION EVIDENCE, EXPERT WITNESS
14	5.6	KNOWINGLY
15	7.6	COMMUNICATION WITH COURT
16	8.112	FALSE DECLARATION BEFORE GRAND JURY
17	Special #1	OBSTRUCTION OF JUSTICE
18	Special #2	ACTIVITIES NOT CHARGED
19	Special #3	EVIDENCE OF OTHER ACTS OF DEFENDANT
20		OR ACTS AND STATEMENTS OF OTHERS